

Office of General Counsel Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

MUR 6925 COUNTY

RE: Campaign Finance Complaint Addendum

Alexander Hornaday, Chairman and Treasurer, First Congressional District Republican Central Committee, #C00569491

Eric Heyssel, Treasurer, First Congressional District Republican Central Committee Andrew Struttmann, Treasurer, First Congressional District Republican Central Committee

Gabriel Schwartz, former Chairman, First Congressional District Republican Central Committee

David Sprecace, former Treasurer, First Congressional District Republican Central Committee

Harry Arkin, legal counsel, First Congressional District Republican Central Committee

Christopher Murray, legal counsel, First Congressional District Republican Central Committee

Ryan Call, Chairman, Colorado Republican Committee, #C00033134

Gentlemen,

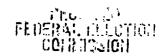
Attached is an addendum to the formal complaint regarding the above entities and their elected or appointed officers.

Please advise as to sufficiency.

Sincerely,

Florence Sebern

Denver CO 80246



2015 MAR 12 PH 4: 12

Federal Elections Commission Campaign Finance Complaint Addendum OF FICE OF GENERAL

Complainant:

Fiorence Sebern

Respondents:

Alexander Hornaday, Chairman and Treasurer, First Congressional

District Republican Central Committee (CD1)

Eric Heyssel, Treasurer, First Congressional District Republican

Central Committee (CD1)

Andrew Struttmann, Treasurer, First Congressional District

Republican Central Committee (CD1)

Gabriel Schwartz, former Chairman, First Congressional District

Republican Central Committee (CD1)

David Sprecace, former Treasurer, First Congressional District

Republican Central Committee (CD1)

Harry Arkin, legal counsel, First Congressional District Republican

Central Committee (CD1)

Christopher Murray, legal counsel, First Congressional District

Republican Central Committee ·

Ryan Call, Chairman, Colorado Republican Committee (CRC)

Date:

March 3, 2015

ADDITIONAL STATEMENT OF POSITION

Additional facts were confirmed at a meeting of the First Congressional District Republican Executive Committee by Chairman Alexander Hornaday.

Eric Heyssel was appointed treasurer for the First Congressional District Republican Central Committee at the time of its assembly in April 11, 2014 and acted as bursar (recording at 59:29). He has been added to the list of respondents. (http://eheyssel.wix.com/erichthetutor)

Andrew Struttmann was appointed treasurer on March 2, 2015 by his own recollection (recording at 42:26) and Chairman Hornaday stated his appointment March 5, 2015 (recording at 1:02:04). Amended FEC reports filed on March 2, 2015 show Chairman Alexander Hornaday continuing to act as treasurer. He has been added to the list of respondents. (andrewstrutts@gmail.com)

Christopher Murray was appointed legal counsel on February 27, 2015 (recording at 46:00). He has been added to the list of respondents.

Chris Murray is shareholder at Brownstein Hyatt Farber Schreck (http://www.bhfs.com/people/attorneys/l-o/cmurray), and a litigator with a unique combination of experience in commercial, political and public law matters. Murray advises and defends charitable and social welfare organizations, PACs, candidates, elected officials and businesses on political and constitutional issues as well as defending the same organizations in governmental investigations or lawsuits arising out of allegations of prohibited conduct.

Enclosed is a recording of the First Congressional District Republican Executive Committee, held on March 6, 2015. In attendance were: Chairman Alexander Hornaday, Vice Chairman Jesse Altum, Secretary Gavin Halligan, Treasurer Andrew Struttman, CD1 Representative to the State GOP Executive Committee Jeff Krump, and Petitioners Jennifer Qualteri and Florence Sebern. Meeting convenes at :23.

Chairman Hornaday's responses to questions asked by Florence Sebern regarding the cashier's check begin at 1:11:34 and end at 1:23:50.

During the meeting, Chairman Hornaday stated:

- The cashier's check was issued by Treasurer David Sprecace at the direction of Chairman Gabriel Schwartz to the Colorado Republican Party, on March 8, 2013.
- A cashier's check was issued to the Colorado Republican Party because the checking account balance was converted to the cashier's check and the account was closed.
- Chairman Hornaday was not a signatory on the issuing checking account for the cashier's check.
- The cashier's check was delivered to the Colorado Republican Party, but not deposited.
- Chairman Ryan Call sent the cashier's check to Chairman Alexander Hornaday, uncashed, and endorsed, after "about two months" from March 8, 2013 -approximately May 2013.
- Chairman Hornaday placed the cashier's check in a safe for "about a year."
- Chairman Hornaday deposited the cashier's check into a trust account "toward the end of 2014."
- The issuance of the cashier's check from the CD1 account to the Colorado
 Republican Party was not reported to the FEC by the Colorado Republican Party

because "no transaction occurred because the State Party did not deposit it into their account."

• The endorsed cashier's check from Chairman Ryan Call to Chairman Alexander Hornaday was not reported to the FEC because "no transaction occurred."

Enclosed is the check image from the Denver Republican Party for the check issued to the First Congressional District Republican Central Committee for assembly badge fees. The check was issued June 10, 2014 and cleared June 23, 2015. The notation in the memo line is: "Hornaday Trust Acct".

I SWEAR OR AFFIRM THAT THE ABOVE AND FOREGOING REPRESENTATIONS ARE TRUE AND CORRECT TO THE BEST OF MY INFORMATION, KNOWLEDGE, AND BELIEF.

Date

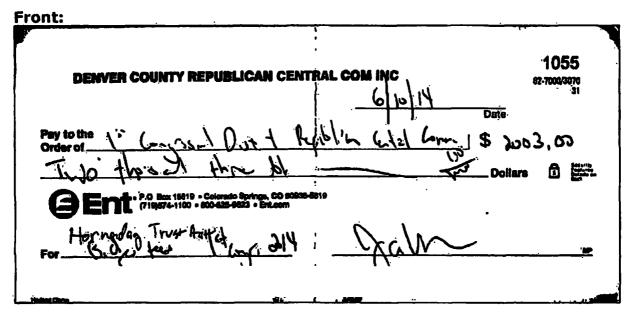
Florence Sebern

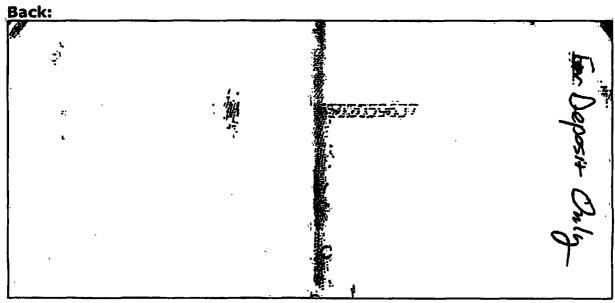
STATE OF COLORADO COUNTY OF DENVER

I, the undersigned Notary Public, do hereby affirm that Florence Sebern personally appeared before me on the ___/_ day of March 2015, and signed the above Affidavit as his free and voluntary act and deed.

My Commission Expires: 05/28/28

Check Image





Check Number: 1055
Date Cleared: 06/23/2014